

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, et al.,	)	
	)	
Plaintiffs,	)	
	)	
and	)	
	)	
UNITED STATES OF AMERICA,	)	Civil Action No. 4:65-cv-01300-HTW-LRA
	)	1300(E)
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
MERIDIAN MUNICIPAL SEPARATE	)	
SCHOOL DISTRICT, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF NATASHA MERLE,  
COUNSEL FOR PRIVATE PLAINTIFFS**

1. I am an attorney at the NAACP Legal Defense and Educational Fund, Inc. and am currently counsel on behalf of Plaintiffs John Barnhardt *et al.* (collectively “Private Plaintiffs”) in this case.

2. On November 7, 1969, the U.S. Court of Appeals for the Fifth Circuit issued an Order enjoining the Meridian Municipal Separate School District (“the District”) from operating a dual school system based on race or color and ordered the immediate implementation of a desegregation plan. The District remains subject to the desegregation plan and its amendments.

3. On November 16, 2017, counsel for Private Plaintiffs requested a site visit with the District on November 27 or December 11, 2017, focused on the *Green* factors and limited to five elementary schools over two days, to assess the District’s progress toward unitary status. *See Ex. 1* (Nov. 16, 2017 email from counsel for Private Plaintiffs to counsel for the District). The District

did not respond to Private Plaintiffs' proposed visitation dates, nor did the District offer alternate dates.

4. On December 12, 2017, Private Plaintiffs followed up with the District, renewing their request for a site visit and offered additional dates: March 19 or March 26, 2018. *See Ex. 2* (Dec. 12, 2017 email from counsel for Private Plaintiffs to counsel for the District).

5. On December 13, 2017, the District responded that the already expired 2017 dates Private Plaintiffs had proposed had not been "conducive," and that counsel for the District would respond to the request. The District did not address the March 2018 dates that Private Plaintiffs proposed. *See Ex. 3* (Dec. 13, 2017 email from the District to counsel for Private Plaintiffs).

6. To date, the District has not responded to Private Plaintiffs' request for a site visit focused on the *Green* factors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 6, 2018.

/s/ Natasha Merle  
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